

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

**FEE STATEMENT COVER SHEET FOR THE
PERIOD APRIL 4, 2023 THROUGH AUGUST 11, 2023**

Debtor: LTL Management LLC (“ LTL ”)	Name of Applicant: King & Spalding LLP (“ K&S ”)
Case No.: 23-12825 (MBK)	Client: Special Counsel to LTL Management LLC
Chapter: 11	Case Filed: April 4, 2023 (the “ Petition Date ”)

**SECTION I
FEE SUMMARY**

<input checked="" type="checkbox"/> Combined Monthly Fee Application	<input type="checkbox"/> Interim Fee Application	<input type="checkbox"/> Final Fee Application
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Summary of Amounts Requested for the Period April 4, 2023 through August 11, 2023 (the “**Combined Statement Period**”)

Total Fees for the LTL Debtor:	\$1,036,587.85 ¹
Total Disbursements:	\$320,751.86
Total Fees Plus Disbursements:	\$1,357,339.71
Minus 20% Holdback of Fees	\$207,317.57
Amount Sought at this Time:	\$1,150,022.14

Summary of Amounts Requested for Previous Periods:

	FEES	EXPENSES
Total Previous Fee Requested:	\$0.00	\$0.00
Total Fees Allowed To Date:	\$0.00	\$0.00
Total Retainer (If Applicable):	\$0.00	\$0.00
Total Holdback (If Applicable):	\$0.00	\$0.00
Total Received By Applicant:	\$0.00	\$0.00

¹ The total amount of fees and expenses incurred by K&S during the Combined Statement Period for matters in which it is solely representing LTL or is representing LTL jointly with Johnson & Johnson is \$1,934,972.31. Of this amount, as set forth in this fee statement, K&S is seeking payment in the amount of \$1,036,587.85 in fees and \$320,751.86 in expenses from LTL. K&S’ fees for matters in which it is solely representing Johnson & Johnson are not reflected in this monthly fee statement.

**COMPENSATION BY PROFESSIONAL
APRIL 4, 2023 THROUGH AUGUST 11, 2023**

The attorneys who rendered professional services in these chapter 11 cases Combined Statement Period are:

NAME OF PROFESSIONAL PARTNERS AND COUNSEL [†]	YEAR ADMITTED	HOURLY RATE	TOTAL APRIL HOURS BILLED	TOTAL MAY HOURS BILLED	TOTAL JUNE HOURS BILLED	TOTAL JULY HOURS BILLED	TOTAL AUGUST HOURS BILLED	TOTAL HOURS BILLED	TOTAL COMPENSATION
Bush, Matthew	2012	\$890.00	2.8	30.2	34.1	0.2	-	67.3	\$59,897.00
Calfo, Alex	1991	\$1,120.00	3.0	5.5	-	0.5	-	9.0	\$10,080.00
Fournier, Kristen	2002	\$1,060.00	123.8	152.4	193.2	44.7	-	514.1	\$544,946.00
Hynes, Kevin	2013	\$890.00	8.8	5.7	7.9	0.3	-	22.7	\$20,203.00
Johnson, Paul	1984	\$1,120.00	3.9	7.8	1.3	7.2	-	20.2	\$22,624.00
Romano, Julia	2008	\$1,000.00	0.7	14.0	8.2	0.4	-	23.3	\$23,300.00
Wilson, Thad	2008	\$1,000.00	3.8	1.3	0.9	-	-	6.0	\$6,000.00
Ashby, Matt*	2000	\$865.00	2.6	-	3.4	-	-	6.0	\$5,190.00
Davidson, Scott*	1996	\$865.00	4.9	0.8	-	-	-	5.7	\$4,930.50
Steinmann, Cori*	2004	\$865.00	6.0	-	6.1	-	-	12.1	\$10,466.50
Total Partners and Counsel:			160.3	217.7	255.1	53.3	-	686.4	\$707,637.00

[†] *Counsel

NAME OF PROFESSIONAL ASSOCIATES [†]	YEAR ADMITTED	HOURLY RATE	TOTAL APRIL HOURS BILLED	TOTAL MAY HOURS BILLED	TOTAL JUNE HOURS BILLED	TOTAL JULY HOURS BILLED	TOTAL AUGUST HOURS BILLED	TOTAL HOURS BILLED	TOTAL COMPENSATION
Baker, Britney	2018	\$888.00	55.1	16.6	5.2	-	0.5	77.4	\$74,226.60
Gascoine, Evan	2008	\$510.00	23.9	5.5	36.0	0.6	-	66.0	\$48,840.00
Hewgley IV, Cason	2017	\$705.00	-	-	8.0	-	-	8.0	\$5,640.00
King, Bryan	2011	\$740.00	57.5	153.3	231.6	76.9	-	519.3	\$384,282.00
Litzinger, Brittany	2020	\$650.00	4.3	3.0	9.4	-	-	16.7	\$10,855.00
McHugh, Jay	2020	\$595.00	-	-	12.4	-	-	12.4	\$7,378.00
Sims, Heather	2021	\$560.00	-	-	16.6	-	-	16.6	\$9,296.00
Tenkhoff, Paige	2020	\$595.00	-	-	5.8	0.3	-	6.1	\$3,629.50
Vives, Michael	2014	\$740.00	-	10.6	12.7	-	-	23.3	\$17,242.00
Kolli, Priya**	2014	\$290.00	-	8.9	2.5	-	-	11.4	\$3,306.00
Total Associates:			140.8	197.9	340.2	77.8	0.5	757.2	\$564,695.10

[†] **Staff Attorney

The paraprofessionals who rendered professional services in these chapter 11 cases during the Combined Statement Period are:

NAME OF PARAPROFESSIONALS AND OTHER NON-LEGAL STAFF	HOURLY RATE	TOTAL APRIL HOURS BILLED	TOTAL MAY HOURS BILLED	TOTAL JUNE HOURS BILLED	TOTAL JULY HOURS BILLED	TOTAL AUGUST HOURS BILLED	TOTAL HOURS BILLED	TOTAL COMPENSATION
Ritzert, Barbara	\$385.00	-	39.9	5.4	-	-	45.3	\$17,440.50
Coplen, David	\$385.00	-	-	5.6	-	-	5.6	\$2,156.00
Fermin, Luis	\$385.00	-	2.5	1.5	-	-	4.0	\$1,540.00
Total Paraprofessionals & Other Non- Legal Staff:		-	42.4	12.5	-	-	54.9	\$21,136.50

The total fees for the Combined Statement Period are:

PROFESSIONALS	BLENDED RATE	TOTAL HOURS BILLED	TOTAL COMPENSATION
TOTALS:			
Partners and Counsel:	\$1,030.94	686.4	\$707,637.00
Associates:	\$745.77	757.2	\$564,695.10
Paraprofessionals and Other Non-Legal Staff:	\$385.00	54.9	\$21,136.50
Blended Attorney Rate:	\$881.36		
Blended Rate for All Timekeepers:	\$863.18		
Total Fees Incurred:		1,498.5	\$1,293,468.60
Less Fees for Johnson & Johnson Only Representation:			(\$256,880.75) ²
Total LTL Debtor Fees:			\$1,036,587.85

² For ease of reference, fees charged 100% to LTL, as well as those charged 50% to LTL and 50% to Johnson & Johnson, are broken down separately in Section II while disbursements are similarly distinguished in Section III.

**SECTION II
SUMMARY OF SERVICES**

**COMPENSATION BY WORK TASK CODE FOR
SERVICES RENDERED BY KING & SPALDING LLP
FOR THE PERIOD APRIL 4, 2023 THROUGH AUGUST 11, 2023**

100% LTL

TASK CODE	DESCRIPTION	APRIL HOURS	MAY HOURS	JUNE HOURS	JULY HOURS	AUGUST HOURS	TOTAL HOURS	AMOUNT
L002	Case Administration	10.6	28.8	78.9	0.3	-	118.6	\$94,753.00
L003	Claims Administration and Objections	-	-	6.1	-	-	6.1	\$5,276.50
L004	Fee/Employment Applications	54.0	18.7	7.8	-	0.5	81.0	\$78,259.10
L005	Relief from Stay Proceedings	2.6	2.6	-	-	-	5.2	\$5,005.00
L006	Litigation Consulting	173.7	136.8	258.0	34.9	-	603.4	\$596,413.50
Totals:		240.9	186.9	350.8	35.2	0.5	814.3	\$779,707.10

50% LTL / 50% Johnson & Johnson

TASK CODE	DESCRIPTION	APRIL HOURS	MAY HOURS	JUNE HOURS	JULY HOURS	AUGUST HOURS	TOTAL HOURS	AMOUNT
L006	Litigation Consulting	60.2	271.1	257.0	95.9	-	684.2	\$513,761.50
Totals:		60.2	271.1	257.0	95.9	-	684.2	\$513,761.50
Less Fees for Johnson & Johnson Only Representation:								(\$256,880.75)
Total Fees Requested:								\$256,880.75

**SECTION III
SUMMARY OF DISBURSEMENTS**

**DISBURSEMENT SUMMARY BY KING & SPALDING LLP
FOR THE PERIOD APRIL 4, 2023 THROUGH AUGUST 11, 2023**

100% LTL

DISBURSEMENTS	APRIL AMOUNTS	MAY AMOUNTS	JUNE AMOUNTS	JULY AMOUNTS	AUGUST AMOUNTS	TOTAL AMOUNTS
-	-	-	-	-	-	-
Totals:	-	-	-	-	-	\$0.00

50% LTL / 50% Johnson & Johnson

DISBURSEMENTS	APRIL AMOUNTS	MAY AMOUNTS	JUNE AMOUNTS	JULY AMOUNTS	AUGUST AMOUNTS	TOTAL AMOUNTS
Court Reporter/Trial Transcripts	\$11,222.27	\$27,315.00	\$31,583.42	\$119,154.58	-	\$189,275.27
Document Delivery	-	\$211.17	-	\$30.97	-	\$242.14
Expert/Professional Fees	\$6,045.70	\$23,738.98	\$12,678.58	-	-	\$42,463.26
Filing Fees	\$2,191.00	\$2,459.75	\$2,152.92	-	-	\$6,803.67
Litigation Support Vendors	\$36,733.72	\$262,718.00	\$61,057.57	\$31,754.50	-	\$392,263.79
Travel	\$91.69	\$2,373.49	\$5,221.04	\$2,769.36	-	\$10,455.58
Totals:	\$56,284.38	\$318,816.39	\$112,693.53	\$153,709.41	-	\$ 641,503.71
Less Expenses for Johnson & Johnson Only Representation:						(\$320,751.86)
Total Requested:						\$320,751.86

SECTION IV CASE HISTORY

- | | |
|--|---|
| (1) Date cases filed: | April 4, 2023 |
| (2) Chapter under which case commenced: | Chapter 11 |
| (3) Date of retention: | June 6, 2023 <i>nunc pro tunc</i> to April 4, 2023 [Dkt. 709] (the “ Retention Order ”) ³ . |
| (4) Summarize in brief the benefits to the estate and attach supplements as needed | SEE BELOW |

During the Combined Statement Period, King & Spalding LLP (“**King & Spalding**”) provided the following services to the Debtor including, but not limited to, the following:

Retention Application Preparation

- Correspond with Jones Day to discuss retention application and supplemental declaration.
- Review interested parties list.
- Prepare and review retention application, disclosure schedule, supplemental declaration, and related exhibits.

Case Administration

- Review complaints to assist Epiq with service matters.
- Compile data related to talc litigation to assist in preparing materials for upcoming hearings.
- Review dismissal-related and similar filings in underlying cases.
- Prepare and revise materials related to motion to dismiss.

Claims Administration and Objections

- Analyze materials and gather information regarding talc claims.

Litigation Counseling

- Assist with various support materials for first day hearing.
- Discuss stay-related matters.
- Discuss and review plan-related materials.

³ The Retention Order is attached hereto as Exhibit A.

- Coordinate with Jones Day to update TRO regarding appeals and communications with appellate team regarding same.
- Attend various witness preparation sessions and depositions.
- Attend hearings.
- Coordinate with the Debtor's professionals concerning ongoing work, deadlines, assignments, and data gathering (including with respect to expert materials).
- Review new complaints and other documents in underlying tort cases to assist bankruptcy counsel with miscellaneous briefing issues.
- Prepare, review, and revise pleadings and related materials for Moline and Emory matters.
- Assist with trial preparation and trial of Valadez (CA).

Relief from Stay Proceedings

- Respond to motion related to Valdez (CA).
- Assist with motions practice related to Janssen and Kenvue.

(5) Anticipated distribution to creditors:

(a) Administration expense:	Unknown at this time.
(b) Secured creditors:	Unknown at this time.
(c) Priority creditors:	Unknown at this time.
(d) General unsecured creditors:	Unknown at this time.

(6) Final disposition of case and percentage of dividend paid to creditors Final dividend percentages are unknown at this time.

I certify under penalty of perjury that the above is true.

Date: August 25, 2023

/s/ Kristen R. Fournier

Kristen R. Fournier